EXHIBIT A

Plaintiff's Deposition Excerpts

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Page 1
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                      UNITED STATES DISTRICT COURT
 2
                   NORTHERN DISTRICT OF CALIFORNIA
 3
                        SAN FRANCISCO DIVISION
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 5
     CHRISTOPHER OTEY, ON BEHALF
 6
     OF HIMSELF AND ALL OTHERS
     SIMILARLY SITUATED,
 7
 8
                Plaintiff,
 9
            vs.
                                       No. C 12-5524 CRB
10
     CROWDFLOWER, INC., LUKAS
     BIEWALD, AND CHRIS VAN PELT,)
11
12
                Defendants.
13
14
15
16
                   DEPOSITION OF CHRISTOPHER OTEY
17
                      San Francisco, California
18
                      Wednesday, May 22, 2013
19
20
21
     Reported by:
     DIANE DEARMORE
     CSR No. 12736
22
     Job No. 1604829
23
24
25
     Pages 1 - 250
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1	Q. By whom?	1	A. I don't know if I had to give a physical
2	A. By a journalist for the Wall Street Journal.	2	address to Amazon Mechanical Turk.
3	Q. Okay. And what have you done with the notes	3	Q. Okay. And what email address did you use at
4	that you made to prepare for that interview with the	4	that point? Was it the dragonresides or the other one?
5	Wall Street Journal?	5	A. I believe it was the dragonresides.
6	A. I don't think I've done anything with them.	6	Q. Okay. And other than when you switched over
7	Q. Do you still have them?	7	to the jaclynfanclub, were there any other email
8	A. I believe so.	8	addresses that you've used with Amazon Mechanical Turk?
9	Q. Did you provide them to your attorneys?	9	A. No.
10	MR. POTASHNICK: They've been produced.	10	Q. Tell me what happened once you started setting
11	MS. KALK: Okay.	11	up and seeing tasks. What did you see?
12	A. Okay. Yes.	12	A. I saw a lot of work being offered.
13	Q. (By Ms. Kalk) All right. Did you actually	13	Q. Am I correct that when you go onto the Amazon
14	interview with the Wall Street Journal about this case?	14	
15	A. I did, yes.	15	Mechanical Turk, what you see is a number, and pages and
16	O. When was that?	16	pages and pages of different types of tasks offered by
17	A. I don't recall the exact date at this time,	17	different task requesters?
18			A. Yes.
	but I think it was in March of this year. February or	18	Q. And you can choose to open or not open any
19	March.	19	particular task based on what you want to do?
20	Q. And did you keep any notes or did you record	20	A. Yes.
21	your discussion with them in any way?	21	Q. So is it fair to say that you're the only
22	A. No.	22	person who decides what task you will or will not open?
23	Q. Okay. And who was the news person you	23	A. Yes.
24	interviewed with, the reporter?	24	Q. Okay. How did you decide which task to
25	A. I believe his name is Jeffrey. I don't	25	perform initially?
	Page 54		Page 56
1	remember his last name.	1	A. Initially I looked at the description of the
2	Q. Do you know if an article was ever printed	2	task, and then the amount.
3	quoting you?	3	Q. You mean the payment amount?
4	A. To my knowledge, an article wasn't created.	4	A. Correct.
5	Q. Do you recall interviews with any other news	5	Q. Am I correct that Amazon Mechanical Turk just
6	sources about this lawsuit?	6	offers money for the tasks?
7	A. No.	7	A. Yeah. All the payments on Amazon Mechanical
8	Q. Okay. Let's go back to when you started with	8	Turk is monitored.
9	Amazon Mechanical Turk in 2010.	9	Q. Right. It's not virtual rewards. It's
10	A. Okay.	10	monetary?
11	Q. Were there any other agreement documents that	11	A. Correct.
12	you're aware of that you had to click or accept with	12	
13	Amazon Mechanical Turk, other than the participation	13	Q. So you look at the task, the contents of what
14		1	they're asking you to do, and what they were paying for
15	agreement, to begin seeing tasks?	14	it?
1	A. Not that I recall at this time.	15	A. Yes.
16	Q. Okay. So once you set up your account did	16	Q. Did you look at anything else in deciding
17	you have an Amazon account before that, or was this a	17	whether or not to open or perform a particular task?
18	new account that you set up in 2010?	18	A. Description, and the number of tasks
19	A. I believe it was a new account.	19	available.
20	Q. Okay. And what information did you have to	20	Q. Why was the number of tasks available an
21	provide?	21	issue?
22	A. To my knowledge, I had to provide my email	22	A. Because it would show how long I could work on
23	address and I believe just my name.	23	that task.
24	Q. Okay. Did you have to give a physical	24	Q. So is it fair to say that you focused on tasks
25	address?	25	that interested you?
	Page 55		Page 57

A. That I'm aware of at this time, yes. Q. Did you ever even visit CrowdFlower's web site before going to Amazon Mechanical Turk? A. I don't recall doing so, no. Q. When is the first time that you spoke to a lawyer about suing CrowdFlower? MR. POTASHNICK: Don't MS. KALK: I don't want the context. Just the date. MR. POTASHNICK: go into what was MR. POTASHNICK: go into what was MR. POTASHNICK: All right. discussed. Q. (By Ms. Kalk) Yeah. I just want the date. A. I don't know the exact date today, but I would assume it's in the summer of 2012. Q. And which lawyer was that? A. I don't recall the name at this time. Q. Was it Mr. Potashnick? A. I did speak with Mr. Potashnick at one point. Q. Was he the first lawyer you spoke to about filling this lawsuit? Again, I don't want the context. Ji just want to understand the first lawyer who you talked to was. A. He wasn't the first, no. I don't know the A. Ho don't care. Have you talked to anyone ab the substance of your answers during any of your testiment of your answers during		· · · · · · · · · · · · · · · · · · ·		
they came from? 3		Q. You didn't know one way or the other where	1	A. No
A. No. Q. You never signed any kind of contract with CrowdFlower, did yous best. MR. POTASHNICK: I'm going to object to the extent it calls for a legal conclusion. But try your best. A. Can you repeat the question? Q. Whas Kalla) Did you ever sign a contract with CrowdFlower? A. No. 10 Did you ever get any kind of code of conduct or terms and conditions of employment? A. Terms and conditions? I have seen 15 CrowdFlower's terms and conditions? I have seen 16 CrowdFlower's terms and conditions? I have seen 19 Q. When did you first speak to one of the lawy that is currently representing you? A. No that I can receil at this time. Q. Were you ever provided copies of terms and identified a task to perform through CrowdFlower's web site? You always went through Amazon Mechanical Turk, right? A. That I'm aware of at this time, yes. Q. Did you ever even visit CrowdFlower's web site before going to Amazon Mechanical Turk, right? A. That I'm aware of at this time, yes. Q. When is the first time that you spoke to a lawyer about suing CrowdFlower? MR. POTASHNICK: Don't	ť		i	
4 Q. Jemifer Connor? 5 CrowdFlower, did you? 6 MR. POTASHNICK: I'm going to object to the stent it calls for a legal conclusion. But try your best. 9 A. Can you repeat the question? 10 Q. (By Ms. Kalk) Did you ever sign a contract with conditions of employment? 11 A. No. I never get any kind of cod of conduct or or for or terms and conditions? I have seen conditions of employment? 12 A. That I'm aware of at this time. 13 Q. Okay. And am I correct that you never sight? 14 A. That I'm aware of at this time, yes. 15 Q. Did you ever even visit CrowdFlower's web site before going to Amazon Mechanical Turk; a lawyer about suing CrowdFlower? 16 MR. POTASHNICK: — go into what was discussed. 17 MR. POTASHNICK: — go into what was assume it's in the summer of 2012. 29 Q. Was he the first time that you spoke to a lawyer about suing CrowdFlower? 29 MR. POTASHNICK: — go into what was assume it's in the summer of 2012. 20 Q. Was he the first tawyer woy upon the filing this lawsuit? 21 Q. Q. Was he the first lawyer you spoke to a sauny. 22 Q. Was he the first lawyer you spoke to a lawyer about suing CrowdFlower? 29 MR. POTASHNICK: — go into what was discussed. 20 Q. Was he the first lawyer woy spoke to about filing shawsiit alwayer and that? 21 Q. Was he the first lawyer woy that? 22 Q. Was he the first lawyer you spoke to a bout filing shawsiit has with filing this lawsuit? 24 Q. Was he the first lawyer you spoke to a bout filing this lawsuit was bout the substance of the earth of your review the documents before did were filed in this lawsuit? 24 Q. Was he the first lawyer woy upoke to about filing this lawsuit was bout the substance. 25 Q. Was he the first lawyer woy spoke to about filing this lawsuit? 26 Q. Was he the first lawyer woy spoke to about filing this lawsuit was a bout the substance of the estimation of the conversation, just the date. 26 Q. Was he the first lawyer woy spoke to about filing this lawsuit? 27 Q. Was he the first lawyer woy spoke to about filing this lawsuit? All right. 28 Q. (By Ms. Kalk) Includin		A. I didn't know anything about the DIY.	1	~
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6 MR. POTASHNICK: I'm going to object to the 7 extent it calls for a legal conclusion. But try your 8 best. 9 A. Can you repeat the question? 10 Q. (By Ms. Kalk) Did you ever sign a contract 11 with CrowdFlower? 12 A. No, I never gigned a contract. 13 Q. Did you ever get any kind of code of conduct 16 or terms and conditions of employment? 17 A. Terms and conditions of employment? 18 CrowdFlower's rems and conditions of employment? 19 Q. Were you ever provided copies of terms and 20 conditions of employment? 21 A. No that I can recall at this time. 22 Q. Okay. And am I correct that you never 23 identified a task to perform through CrowdFlower's web 24 site? You always went through Amazon Mechanical Turk, 25 right? 2 Page 114 1 A. That I'm aware of at this time, yes. Q. Did you ever even visit CrowdFlower's web site before going to Amazon Mechanical Turk? 4 A. I don't recall doing so, no. Q. When is the first time that you spoke to a lawyer about suing CrowdFlower's web site 9 date. 10 MR. POTASHNICK: Don't — MS. KALK: I don't want the context. Just the date. 11 don't want the context. Just the date. 12 Q. And which lawyer was that? 13 A. I don't know the exact date at this time, we was that? 14 Loudl — best guess is either late August or Septemt 15 202. Prior to filing this lawsuit, did you review the complaint? 16 MR. POTASHNICK: Do you know what a conic explanation? 17 THE WITNESS: Could I get a little more of an explanation? 18 A. Yes. 19 Page 114 10 A. That I'm aware of at this time, yes. Q. Did you ever even visit CrowdFlower's web site before going to Amazon Mechanical Turk, 4 A. I don't recall doing so, no. Q. When is the first time that you spoke to a lawyer about suing CrowdFlower's 19 A. Yes. 10 Q. Were they accurate? 11 A. Yes. 11 Q. Was It Mr. Potashnick? 12 Q. And which lawyer was that? 13 A. I don't recall the name at this time. 14 Limcher devenue the context is the sume of a caplanation? 15 Q. (By Ms. Kalk) Including an attorney it it is the summer of 2012. 16 Q. (By Ms. Kalk) Including an a	(1	
textent it calls for a legal conclusion. But try your best. best. A. Can you repeat the question? Q. (By Ms. Kalk) Did you ever sign a contract with CrowdFlower? A. No, I never signed a contract. Q. Did you ever receive an offer letter? A. No, I never signed a contract. Q. Did you ever get any kind of code of conduct or terms and conditions of employment? A. Terms and conditions of employment? A. Terms and conditions of employment? A. Not that I can receal at this time. Q. Okay. And am I correct that you never conditions of employment? A. Not that I can receal at this time. Q. Okay. And am I correct that you never conditions of employment? A. That I'm aware of at this time, yes site? You always went through Amazon Mechanical Turk, right? A. That I'm aware of at this time, yes site? You always went through Amazon Mechanical Turk? A. I don't recall doing so, no. Q. Did you ever even visit CrowdFlower's web site before going to Amazon Mechanical Turk? A. I don't recall doing so, no. Q. When is the first time that you spoke to a lawyer about suing CrowdFlower? MR. POTASHNICK: Don't - MS. KALK: I don't want the context. Just the date. A. I don't know the exact date at this time, but I would assume it's in the summer of 2012. Q. Obid you ever even visit CrowdFlower's web site before going to Amazon Mechanical Turk? MR. POTASHNICK: Don't - MS. KALK: We can go whenever. This is as good at time to break as any. MR. POTASHNICK: All right. MR. POTASHNICK: All right. MR. POTASHNICK: All right. MR. POTASHNICK: All right. MR. POTASHNICK: Other than an attorney! It we substance once the deposition starts. The rules that the substance of the estimony once the deposition starts. The rules that when the substance of the estimony once the deposition starts. If you were to talk about "don't talk so the substance of the estimony once the deposition starts. The rules that allow you to talk about the substance of the estimony once the deposition starts. If you were to talk about do anyone about the subst			i	
8 best. 8 A. No. Q. When did you first speak — and, again, I don't want the context of the conversation, just the date. When did you first speak and, again, I don't want the context of the conversation, just the date. When did you first speak to one of the lawy that is currently representing you in this lawsuit? 10 don't want the context of the conversation, just the date. When did you first speak to one of the lawy that is currently representing you in this lawsuit? 10 don't want the context of the conversation, just the date. When did you first speak to one of the lawy that is currently representing you in this lawsuit; date. When did you first speak to one of the lawy that is currently representing you in this lawsuit? 10 don't want the context of the conversation, just the date. When did you first speak to one of the lawy that is currently representing you in this lawsuit; date. When did you first speak — and, again, I don't want the context of the conversation, just the date. When did you first speak — and, again, I don't want the context of the conversation, just the date. When did you first speak — and, again, I don't want the context of the conversation, just the date. When did you first speak to one of the lawy that is currently representing you in this lawsuit; date. When did you first speak to one of the lawy that is currently representing you in this lawsuit; date. When did you first speak — and, again, I don't want the context of the conversation, just the date when did you first speak to one of the lawy that is currently representing you in this lawsuit; date this time, but the complaint?	е			· · · · · · · · · · · · · · · · · · ·
A. Can you repeat the question? Q. (By Ms. Kalk) Did you ever sign a contract with CrowdFlower? A. No, I never signed a contract. Did you ever receive an offer letter? A. No, I never signed a contract. Did you ever get any kind of code of conduct or terms and conditions of employment? A. No. C. Did you ever get any kind of code of conduct or terms and conditions? I have seen CrowdFlower's terms and conditions, I believe. Q. Were you ever provided copies of terms and conditions of employment? A. Not that I can recall at this time. Q. Okay. And am I correct that you never identified a task to perform through CrowdFlower's web site? You always went through Amazon Mechanical Turk, right? Page 114 A. That I'm aware of at this time, yes. Q. Did you ever even visit CrowdFlower's web site before going to Amazon Mechanical Turk? A. I don't recall doing so, no. Q. When is the first time that you spoke to a lawyer about suing CrowdFlower? MR. POTASHNICK: Don't - MS. KALK: I don't want the context. Just the date. Q. Q. When sit he first time that you spoke to a lawyer about suing CrowdFlower? MR. POTASHNICK: or go into what was dideate. MR. POTASHNICK: or go into what was MR. POTASHNICK: I have 12:15. When is a micro for lunch? MR. POTASHNICK: or go into what was MR. POTASHNICK: All right. Lunch, did you talk with anyone about the substance once the deposition starts. If you were to talk about "don't talk so much," I don't care. Have you talked to anyone at the substance of your answers during any of your te that is currently representing you in this lawsuit? A. I don't know the exact date to this lime, but that is currently representing you in this lawsuit? A. I don't know the exact date at this time, but leads twe mand that is currently representing you in this lawsuit? A. I don't know the exact date to five temps in the complaint? RR. POTASHNICK: Do you know what a co size? Q. By Ms. Kalk) The pleading that was filed start the lawsuit, the document that started this lawsuit, did you review the documents before the v	_	· ·		- 00
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25 Q. Was it Ellen Doyle? 25 A. No.		-	25	•
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